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March 22, 2021

By ECF
Honorable Edgardo Ramos
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

The March 31 status conference is adjourned to May 6, 2021, at 11:00 a.m. The parties are instructed to dial (877) 411-9748 and enter access code 3029857# when prompted. Speedy trial time is excluded from March 31, 2021, until May 6, 2021 in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 3/23/2021
New York, New York

Re: United States v. Angela Rodriguez
20 Cr. 39 (ER)

Dear Judge Ramos:

MEMO ENDORSED

I represent defendant Angela Rodriguez in the above-referenced matter. A status conference has been scheduled in this matter for March 31, 2021 at 11:30 a.m. For the reasons which follow, the defense writes now to respectfully request that the conference be adjourned for 30-days.

As I indicated in my letter to the Court dated January 13, 2021, this is a case with a voluminous amount of information, which ideally requires *in-person* consultation with Ms. Rodriguez. Thankfully, at least for the time being, this is now possible. In fact, defense counsel is scheduled to meet with Ms. Rodriguez in-person on April 6, 2021. The defense should be in a much better position to evaluate where things stand with this case after this meeting. It is primarily for this reason that the defense makes this request for an adjournment.

I have discussed the above with A.U.S.A. Samuel Rothschild, who consents to this request. For these same reasons, and in the interests of justice, the defense consents to the exclusion of time under the Speedy Trial Act until the anticipated adjourn date.

Thank you.

Respectfully,

/s/ Matthew J. Kluger
Matthew J. Kluger, Esq.
Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild